

MELANIE D. MORGAN, ESQ.  
Nevada Bar No. 8215  
VATANA LAY, ESQ.  
Nevada Bar No. 12993  
AKERMAN LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: melanie.morgan@akerman.com  
vatana.lay@akerman.com

*Attorneys for Plaintiffs Bayview Loan  
Servicing, LLC and Federal Home Loan  
Mortgage Corporation*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BAYVIEW LOAN SERVICING, LLC; and  
FEDERAL HOME LOAN MORTGAGE  
CORPORATION,

Plaintiff,

vs.

WASHINGTON & SANDHILL  
HOMEOWNERS ASSOCIATION; ABSOLUTE  
COLLECTION SERVICES, LLC; SILVER  
STREAM ADVISORS, LLC; and NEW  
DIRECTION IRA, INC. FBO MARIJO TINLIN,  
IRA,

Defendants.

Case No.: 2:17-cv-00026-GMN-CWH

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

Pursuant to LR IA 6-1 and LR 26-4, Bayview Loan Servicing, LLC (**Bayview**) and Federal Home Loan Mortgage Corporation (**Fannie Mae**), Washington & Sandhill Homeowners Association (**Washington**), Absolute Collection Services, LLC (**ACS**), and Silver Stream Advisors, LLC (**Silver Stream**) by and through their undersigned counsel of record, hereby submit the following Stipulation and [Proposed] Order to Extend Discovery Deadlines. This is the first stipulation for extension of the subject discovery deadlines submitted by the parties.

**A. Discovery Completed.**

The following discovery has been completed thus far:

1           **1. Initial Disclosures:** On September 14, 2017, Plaintiffs served their initial disclosures. On  
2 December 7, 2017 Washington served its initial disclosures.

3           **2. Expert Disclosures:** The deadline for expert disclosures has not yet passed.

4           **3. Written Discovery:** On January 23, 2018, BANA served respective requests for  
5 admission, interrogatories, and requests for production of documents on Silver Stream, ACS and  
6 Washington.

7           **4. Depositions:** No depositions have taken place.

8           **B. Discovery Remaining.**

9           The parties anticipate engaging in additional discovery, including but not limited to:

10           **1. Depositions:** On January 24, 2018, BANA served an amended notices to take the  
11 deposition of the FRCP 30(b)(6) representative of Washington on March 20, 2018. The parties  
12 anticipate taking the depositions of Silver Stream and ACS's Fed R. Civ. P. 30(b)(6) witnesses.

13           **2. Washington's Discovery:** Washington anticipates it will disclose its expert  
14 designations, take depositions of Plaintiffs, and serve its written discovery requests on Plaintiffs, in  
15 the event the parties are unable to settle this matter within the next 30 days.

16           **C. Reasons Why Discovery Not Completed.**

17           The parties are working diligently to settle this matter and request additional time for  
18 settlement discussions without expending the time and expenses in conducting discovery. The  
19 parties submit this stipulation in good faith, without the purpose of undue delay, and respectively  
20 request that the Court extend the pending discovery deadlines by thirty (30) days pursuant the  
21 proposed schedule listed below.

22           **D. Proposed Schedule.**

- 23           1. Discovery Cut-Off: May 14, 2018.  
24           2. Disclosure of Expert: March 14, 2018  
25           3. Rebuttal Expert: April 13, 2018  
26           4. Interim Status Report: March 14, 2018  
27           5. Dispositive Motions: June 13, 2018

28       ///

6. Pre-Trial Order: July 13, 2018

DATED this 12th day of February, 2018

**AKERMAN LLP**

/s/ Vatana Lay

MELANIE MORGAN, ESQ.

Nevada Bar No. 8215

VATANA LAY, ESQ.

Nevada Bar No. 12993

1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

*Attorneys for Plaintiffs*

DATED this 12th day of February, 2018

**ABSOLUTE COLLECTION SERVICES, LLC**

/s/ Shane D. Cox

SHANE D. COX, ESQ.

Nevada Bar No. 13852

8440 W. Lake Mead Blvd., Suite 210

Las Vegas, Nevada 89128

*Attorneys for Absolute Collection Services, LLC*

DATED this 12th day of February, 2018

**GORDON REES SCULLY MANSUKHANI, LLP**

/s/ Wing Yan Wong

WING YAN WONG, ESQ.

Nevada Bar No. 13622

300 S. Fourth Street, Ste. 1550

Las Vegas, Nevada 89101

*Attorney for Washington & Sandhill HOA*

DATED this 12th day of February, 2018

**ALDRICH LAW FIRM, LTD.**

/s/ John P. Aldrich

JOHN P. ALDRICH

Nevada Bar No. 6877

CATHERINE HERNANDEZ, ESQ.

Nevada Bar No. 8410

300 S. Fourth Street, Ste. 1550

Las Vegas, Nevada 89101

*Attorney for Silver Stream Advisors, LLC*

IT IS SO ORDERED.

DATED: February 13, 2018

C.W. HOFFMAN, JR.

UNITED STATES MAGISTRATE JUDGE